



BY ECFS

EX PARTE

December 7, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from Obsolete ILEC Regulatory Obligations That Inhibit Deployment of Next-Generation Networks*, WC Docket 14-192

Dear Ms. Dortch:

On Thursday, December 3, 2015, Michael Galvin of Granite Telecommunications, LLC ("Granite"), Thomas Jones of Wilkie Farr & Gallagher, LLP, Eric Branfman of Morgan Lewis, Kevin Joseph, on behalf of Granite, and the undersigned met with Claude Aiken of the Office of General Counsel, and Matt DelNero and Randy Clarke of the Wireline Competition Bureau to discuss this proceeding. Messrs. Galvin, Jones, Branfman, Joseph and I also met on December 3 with Travis Litman of Commissioner Rosenworcel's office. Messrs. Galvin, Jones, Branfman and I also met on December 3 with Amy Bender of Commissioner O'Rielly's office and separately with Nick Degani of Commissioner Pai's office.

In each of these meetings, we explained our opposition to the aspects of the USTelecom Petition for Forbearance relating to Section 271 and the 64 kbps requirement set forth in 47 C.F.R. § 51.319(a)(3)(iii)(C). Consistent with our previous filings,¹ we stressed the importance of these provisions to Granite's ability to negotiate wholesale voice platform services agreements and discussed examples where these provisions served as an effective "regulatory backstop" in past negotiations.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Paula', followed by a large, stylized flourish that loops around the text.

Paula Foley
Regulatory Counsel
Granite Telecommunications

¹ See Letter from Eric Branfman, counsel to Granite, to Ms. Marlene Dortch, WC Dkt. No. 14-192 (Sept. 22, 2015) (summarizing arguments made by Granite in this proceeding and attaching previous *ex parte* filings by Granite in this proceeding as exhibits).

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Ms. Marlene Dortch
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cc: Claude Aiken
Matthew DelNero
Randy Clarke
Travis Litman
Amy Bender
Nick Degani